

# Fact Sheet



## For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-03900005-2012**  
Application Received: **January 31, 2011**  
Plant Identification Number: **03900005**  
Permittee: **Union Carbide Corporation**  
Facility Name: **Institute Plant**  
Business Unit: **Acetone Derivatives (Group 2 of 5)**  
Mailing Address: **P. O. Box 8361, South Charleston, WV 25303**

---

Physical Location:	Institute, Kanawha County, West Virginia
UTM Coordinates:	432.00 km Easting • 4,284.31 km Northing • Zone 17
Directions:	From I-64, take the Institute exit, turn right onto State Route 25. Plant is located about ½ mile on west Route 25.

---

### Facility Description

The Acetone Derivatives Plant converts isopropanol and/or acetone to produce various ketones and alcohols that are used in a wide range of applications including hair spray, nail polish remover, lacquer thinner, sinus tablets, and coatings used in the automobile industry.

## Emissions Summary

<b>Acetone Derivatives (Group 2 of 5) Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2010 Actual Emissions</b>
Carbon Monoxide (CO)	17.7	1.49
Nitrogen Oxides (NO <sub>x</sub> )	21.0	7.5
Particulate Matter (PM <sub>2.5</sub> )	1.3	0.4
Particulate Matter (PM <sub>10</sub> )	1.3	0.4
Total Particulate Matter (TSP)	1.3	0.4
Sulfur Dioxide (SO <sub>2</sub> )	0.13	< 0.1
Volatile Organic Compounds (VOC)	82	31

*PM<sub>10</sub> is a component of TSP.*

<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2010 Actual Emissions</b>
Benzene	0.01	0.0
Biphenyl	0.6	0.5
Isophorone <sup>1</sup>	0.2	0.35
Methanol	1	0.3
Methyl Isobutyl Ketone	12	8
Toluene	0.01	0.0
Xylene	0.01	0.0

*Some of the above HAPs may be counted as PM or VOCs.*

<sup>1</sup>Includes emissions from Logistics Operations

Note: The shutdown of the TONE<sup>®</sup> Process resulted in a decrease in potential VOC emissions and elimination of potential ethylene glycol emissions.

## Title V Program Applicability Basis

Due to the facility-wide potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Union Carbide Corporation's Institute Plant is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

## Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	Control of particulate matter from indirect heat exchangers.
	45CSR6	Open burning prohibited.
	45CSR10	Control of sulfur dioxide emissions.
	45CSR11	Standby plans for emergency episodes.
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR16	Emission Standards for New Stationary Sources pursuant to 40 C.F.R. 60.
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for Hazardous Air Pollutants.
	40 C.F.R. 60, Subpart Kb	NSPS for Volatile Organic Liquid Storage Vessels.
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. 63, Subparts F, G, H	Hazardous Organic NESHAP (HON)
	40 C.F.R. 63, Subpart FFFF	Miscellaneous Organic NESHAP (MON)
	40 C.F.R. 63, Subpart DDDDD	Boiler and Process Heater MACT
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR§§21-37 and 40	Control of VOC Emissions.

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

### Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
CO-R21-97-41	October 20, 1997	June 14, 2006 letter from J. L. Blatt October 7, 2011 letter from T. J. London

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

## Determinations and Justifications

### Changes to Title V Permit

- 1) **Revised the 40 C.F.R. 63, Subpart DDDDD (Boiler MACT) Requirements for the Dowtherm Furnace (B032).** On February 21, 2011, EPA signed the final rule for the Boiler MACT. This rule was published in the Federal Register on March 21, 2011 which established the existing source compliance date as March 21, 2014. The Dowtherm Furnace (B032) is natural gas-fired with a heat input of 60 MMBtu/hr. The 40 C.F.R. 63, Subpart DDDDD placeholder language specified in Condition 4.1.11 has been updated accordingly. Also, the permit shield specified in Condition 3.7.2.a for the Dowtherm Furnace (B032) was removed because it no longer applies.

On May 18, 2011 EPA published a Federal Register final rule (76 FR 28662-28664) staying 40 CFR 63, Subpart DDDDD in its entirety along with an indefinite delay of its effective date. This EPA action reads in part:

#### **“II. Issuance of a Stay and Delay of Effective Date**

Pursuant to section 705 of the APA, the EPA hereby postpones the effectiveness of the Major Source Boiler MACT and the CISWI Rule until the proceedings for judicial review of these rules are complete or the EPA completes its reconsideration of the rules, whichever is earlier. By this action, we are delaying the effective date of both rules, published in the **Federal Register** on March 21, 2011 (76 FR 15608 and 76 FR 15704). The delay of the effective date of the CISWI Rule applies only to those provisions issued on March 21, 2011, and not to any provisions of 40 CFR part 60, subparts CCCC and DDDD, in place prior to that date. This delay of effectiveness will remain in place until the proceedings for judicial review are completed or the EPA completes its reconsideration of the rules, whichever is earlier, and the Agency publishes a notice in the **Federal Register** announcing that the rules are in effect.”

- 2) **Revised the Risk Management Plan (RMP) Requirements in Condition 3.1.8.** Although the Risk Management Plan (RMP) requirements of 40 C.F.R. 68 apply to some business units within the Institute Plant, they do not apply to all business units, including Acetone Derivatives. In all the initial Title V permits for the Institute Plant, the RMP boilerplate requirements stated that the stationary source was subject to RMP with the entire Institute Plant being considered as the stationary source. Each individual business unit's applicability to the RMP requirements was not considered. Union Carbide has requested that the boilerplate language included in each Title V permit consider the RMP applicability for that business unit and not the entire plant. Since Acetone Derivatives is not subject to RMP requirements, the boilerplate language included as Condition 3.1.8 has been changed and a clarification has been added to indicate that this determination of non-applicability only applies to Acetone Derivatives.
- 3) **Removed 40 C.F.R. 63, Subpart FFFF (MON) Placeholder Language.** The 40 C.F.R. 63, Subpart FFFF (MON) placeholder language in condition 4.1.6 is no longer necessary because the MON applicable requirements were incorporated in Title V significant permit modification R30-03900005-2006 (Group 2 of 5) (SM01), issued on February 3, 2009.
- 4) **Addition of Tank 265 (T265) and the Acetone Industrial Refrigeration System (FES) to the Section 1.1 Emission Units Table.** Tank 265 (emission unit ID T265; emission point ID 035AAA) was installed in 2006 to store process coolant (ethylene glycol/water mixture) for the Acetone Industrial Refrigeration System (emission unit ID FES). Tank 265 is not subject to any applicable requirements. The Acetone Industrial Refrigeration System is subject to Condition 3.1.7.

- 5) **Addition of Tank 265 (T265) to the list of sources not subject to 40 C.F.R. 63, Subpart EEEE (OLD) in Condition 3.7.2.a.** The liquid vapor pressure of the process coolant (ethylene glycol/water mixture) stored in Tank 265 (T265) is less than 0.1 psia, therefore 40 C.F.R. 63, Subpart EEEE (OLD) does not apply. Tank 265 was added to the list of sources in Condition 3.7.2.a for which the OLD MACT is not applicable.
- 6) **Section 1.1 Emission Units Table Changes.** The following changes were made to the Emission Units Table in Section 1.1:

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Control Device
<u>T265</u> <sup>1</sup>	<u>035AAA</u>	<u>Tank 265</u>	<u>2006</u>	<u>None</u>
<del>T377</del> <sup>2</sup>	<del>37A</del>	<del>Tank 377</del>	<del>1942</del>	<del>None</del>
<del>T378</del> <sup>2</sup>	<del>37A</del>	<del>Tank 378</del>	<del>1942</del>	<del>None</del>
<del>T379</del> <sup>2</sup>	<del>37A</del>	<del>Tank 379</del>	<del>1942</del>	<del>None</del>
<del>T380</del> <sup>2</sup>	<del>37A</del>	<del>Tank 279</del>	<del>1942</del>	<del>None</del>
T1008	035F	Tank 1008	1949 ( <u>internal floating roof installed 2008</u> ) <sup>3</sup>	None
T1009	035G	Tank 1009	1949 ( <u>internal floating roof installed 2008</u> ) <sup>3</sup>	None
<del>T1017</del> <sup>2</sup>	<del>045B</del>	<del>Tank 1017</del>	<del>Out of Service</del>	<del>None</del>
<del>T1018</del> <sup>2</sup>	<del>035P</del>	<del>Tank 1018</del>	<del>Out of Service</del>	<del>None</del>
T1201 <sup>4</sup>	045L	Tank 1201 — operated by Logistics	1949	None
<del>T1203</del> <sup>2</sup>	<del>045W</del>	<del>Tank 1203</del>	<del>1949</del>	<del>None</del>
<del>T1220</del> <sup>5</sup>	<del>035YY</del>	<del>Tank 1220</del>	<del>1948</del>	<del>None</del>
<del>T1230</del> <sup>2</sup>	<del>045G</del>	<del>Tank 1230</del>	<del>1952</del>	<del>None</del>
S210	030S, <del>030E</del> <sup>6</sup>	Still 210	1942	<del>S030</del> <sup>7</sup> 210/216 Product Recovery Device J211 211-Condenser Jet <u>None</u>
S212	030J	Still 212	<del>1942-2006</del> <sup>9</sup>	None
S216	030S, <del>030E</del> <sup>6</sup>	Still 216	1942	<del>S030</del> <sup>7</sup> 210/216 Product Recovery Device J216 216-Condenser Jet <u>None</u>
<del>S030</del> <sup>8</sup>	<del>030S</del>	<u>210/216 Still Recovery Device</u>	<u>1994</u>	<u>None</u>
<del>S219</del> <sup>10</sup>	<del>040C, 040E</del>	<del>Still 219</del>	<del>1963</del>	<del>None</del>
<del>S220</del> <sup>10</sup>	<del>040B</del>	<del>Still 220</del>	<del>1987</del>	<del>None</del>
S221	030I	Still 221	<del>Out of Service</del> <u>1964</u> <sup>11</sup>	None
<del>S252</del> <sup>10</sup>	<del>040E</del>	<del>Still 252</del>	<del>1942</del>	<del>None</del>
OPT	045V	Oil Pot	1944	<del>V045</del> Vent Condenser <u>None</u> <sup>12</sup>

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Control Device
R201	030A or Header to Powerhouse <u>Emission Unit ID S201<sup>13</sup></u>	Reactor 201 (aka Converter 201)	1942	030A Reactivation Scrubber or Header <u>None<sup>13</sup></u>
R202	030A or Header to Powerhouse <u>Emission Unit ID S201<sup>13</sup></u>	Reactor 202 (aka Converter 202)	1942	030A Reactivation Scrubber or Header <u>None<sup>13</sup></u>
R203	030A or Header to Powerhouse <u>Emission Unit ID S201<sup>13</sup></u>	Reactor 203 (aka Converter 203)	1942	030A Reactivation Scrubber or Header <u>None<sup>13</sup></u>
R206	030A or Header to Powerhouse <u>Emission Unit ID S201<sup>13</sup></u>	Reactor 206 (aka Converter 206)	1942	030A Reactivation Scrubber or Header <u>None<sup>13</sup></u>
R207	030A or Header to Powerhouse <u>Emission Unit ID S201<sup>13</sup></u>	Reactor 207 (aka Converter 207)	1942	030A Reactivation Scrubber or Header <u>None<sup>13</sup></u>
R208	030A or Header to Powerhouse <u>Emission Unit ID S201<sup>13</sup></u>	Reactor 208 (aka Converter 208)	1942	030A Reactivation Scrubber or Header <u>None<sup>13</sup></u>
R209	030A or Header to Powerhouse <u>Emission Unit ID S201<sup>13</sup></u>	Reactor 209 (aka Converter 209)	1942	030A Reactivation Scrubber or Header <u>None<sup>13</sup></u>
<del>R211<sup>14</sup></del>	<del>030A or Header to Powerhouse</del>	<del>Reactor 211 (aka Converter 211)</del>	<del>Out of Service</del>	<del>030A Reactivation Scrubber or Header</del>
S201 <sup>15</sup>	Vents to Powerhouse or Emission Unit ID B032	201 Scrubber	1998	None
<del>F040<sup>16</sup></del>	<del>040F</del>	<del>TT/TC Scrubber—operated by Logistics</del>	<del>1940s</del>	<del>None</del>
TCL4 <sup>16</sup>	L4TC or 040F	East Rack Rail Car Loading – operated by Logistics	1940s	None or Scrubber F040
FES <sup>1</sup>	None	Acetone Industrial Refrigeration System	2006	None

<sup>1</sup>Tank 265 (T265) and the Acetone Industrial Refrigeration System (FES) were added in 2006.

<sup>2</sup>Tanks T377, T378, T379, T380, T1017, T1018, T1203, and T1230 have been removed from service.

<sup>3</sup>Internal floating roofs were installed on Tanks 1008 and 1009 in 2008. These changes did not require a 45CSR13 permit per PD08-17, dated March 6, 2008.

<sup>4</sup>Tank 1201 was operated by Logistics (Group 3 of 5). The tank will now be included with Acetone Derivatives (Group 2 of 5), but is currently idle.

<sup>5</sup>Tank T1220 has been transferred to POLYOX<sup>®</sup> WSR and will be included in the Emission Units Table for Group 5 of 5.

- <sup>6</sup>Removal of the references to emission points 030F and 030E for Stills 210 and 216. All vents from Stills 210 and 216 are now routed to the 210/216 Product Recovery Device (S030) and vented through emission point 030S.
- <sup>7</sup>Removal of the control devices listed for Stills 210 and 216. According to Union Carbide, the 210/216 Product Recovery Device (S030), the 210 Condenser Jet (J210) {misabeled as 211 Condenser Jet (J211) in the initial Title V Permit's Emission Units Table}, and the 216 Condenser Jet (J216) are recovery devices and not control devices. Although the 210/216 Product Recovery Device (S030) was listed as a control device in the Emissions Unit Table in the initial Title V permit, it was listed as a Group 2 process vent subject to 40 C.F.R. 63, Subpart G (HON) in Section 4.0.
- <sup>8</sup>Addition of the 210/216 Product Recovery Device (S030) as an emission unit.
- <sup>9</sup>The installation date for Still 212 was revised to reflect the replacement of some of the original distillation system components in 2006.
- <sup>10</sup>Stills S219, S220, and S252 have been removed from service.
- <sup>11</sup>The installation date for Still 221 was added. This still is no longer listed as out of service.
- <sup>12</sup>Removed the Vent Condenser (V045) as a control device for the Oil Pot (OPT). The Oil Pot (OPT) is routed to the Vent Condenser (V045), but the emission reduction efficiency is 0%.
- <sup>13</sup>The information provided in the initial Title V permit's Emission Units Table for the reactors (201, 202, 203, 206, 207, 208, and 209) required clarification and has been revised. In the initial Title V permit, it appeared that emissions from the reactors would either go to the Reactivation Scrubber (A030) or to Bayer's Powerhouse Boiler which were both listed as control devices. Actually, the vent gases from the reactors are only sent to the Reactivation Scrubber (A030) during reactor burnouts (reactivations). During production, the vent gases are first sent to the 201 Scrubber (S201) and do not vent directly to the Powerhouse Boiler. The 201 Scrubber is a process absorber that receives the process vent gases from the distillation system (including the reactors) and removes the organics which are recovered by subsequent processing. The gas stream from the 201 Scrubber, which contains mostly hydrogen, is burned as fuel in Bayer's Powerhouse Boiler.
- <sup>14</sup>Reactor R211 has been removed from service.
- <sup>15</sup>UCC plans to re-route the hydrogen stream from the 201 Scrubber to the Dowtherm Furnace (Emission Unit ID B032) starting in the 4<sup>th</sup> quarter of 2011 or 2012. A permit determination request was not submitted to DAQ, but the records are being maintained on site by UCC in accordance with 45CSR§13-5.14. UCC provided supplemental information to the Title V permit renewal application including details of the project along with calculations of the emission rates associated with the change. The option of routing the gas stream from the 201 Scrubber to either the Powerhouse Boiler or Dowtherm Furnace has been reflected in the Emission Units Table for the Title V renewal. The Powerhouse Boiler and Dowtherm Furnace are considered fuel gas systems as defined in 40 C.F.R. §63.101 and not control devices.
- <sup>16</sup>Revised the entries for the TT/TC Scrubber (F040) and East Rack Rail Car Loading (TCL4). The scrubber controls emissions from the rail car loading operation and are covered under the permit for Logistics (Group 3 of 5). The Emission Units Table was revised to be more consistent with the Emission Units Table for Group 3 of 5.

- 7) **Addition/Deletion of Requirements and Changes to the Numbering of the Title V Permit.** The following conditions have been added, deleted, or renumbered as part of this Title V permit renewal:

Condition Number in R30-03900005-2006 (2 of 5) (SM01)	Condition Number in R30-03900005-2011 (2 of 5)	Explanation, if needed.
3.7.2.a	---	Removed
3.7.2.b	3.7.2.a	Renumbered
3.7.2.c	3.7.2.b	Renumbered
4.1.6	---	MON placeholder language was deleted. MON requirements were addressed in R30-03900005-2006 (2 of 5) (SM01)
4.1.7	4.1.6	Renumbered
4.1.8	4.1.7	Renumbered
4.1.9	4.1.8	Renumbered
4.1.10	4.1.9	Renumbered
4.1.11	4.1.10	Renumbered
4.1.12	4.1.11	Renumbered and placeholder language updated.
4.1.13	4.1.12	Renumbered
4.1.14	4.1.13	Renumbered
4.1.15	4.1.14	Renumbered
4.5.3	---	Deleted "Reserved."
4.5.4	4.5.3	Renumbered
4.5.5	4.5.4	Renumbered
4.5.6	4.5.5	Renumbered
4.5.7	4.5.6	Renumbered
4.5.8	4.5.7	Renumbered
4.5.9	4.5.8	Renumbered
4.5.10	4.5.9	Renumbered
4.5.11	4.5.10	Renumbered

- 8) **Revised Consent Order CO-R21-97-41 Attachment A.** On October 7, 2011, UCC submitted changes to Attachment A of their Consent Order CO-R21-97-41 for equipment in the Acetone Derivatives Business Unit. These changes are as follows: 1) Updated the emission limits for Tanks T1006 and T1016 to account for floating roof landing events; 2) Updated the emission limits for Tanks T1008 and T1009 to account for the installation of floating roofs in 2008; and 3) Addition of existing source TTL030 to Attachment A since MTE is now greater than 6 lbs/hr when loading liquid residues from existing Tank T1016 into tank trucks for shipment off site. The changes were approved by the Director on November 17, 2011.

#### **40 C.F.R. 64 - Compliance Assurance Monitoring (CAM)**

According to 40 C.F.R. §64.2(a), CAM applies to a pollutant-specific emissions unit at a major source that is required to obtain a part 70 or 71 permit if the unit satisfies all of the following criteria: 1) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant (or a surrogate thereof), other than an emission limitation or standard that is exempt under 40 C.F.R. §64.2(b)(1); 2) The unit uses a control device to achieve compliance with any such emission limitation or standard; and 3) The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source. 40 C.F.R. §64.2(b)(1)(i) exempts emission limitations or standards proposed by the Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act; and 40 C.F.R. §64.2(b)(1)(vi) exempts emission limitations or standards for which a part 70 or 71 permit specifies a continuous compliance determination method.



Acetone Derivatives has the following equipment with emission controls:

Emission Unit	Emission Unit Description	Control Device	Emission Point
T220	Tank 220	V045	045V
R201	Reactor 201	030A Reactivation Scrubber	030A
R202	Reactor 202		
R203	Reactor 203		
R206	Reactor 206		
R207	Reactor 207		
R208	Reactor 208		
R209	Reactor 209		
TCL4	East Rack Rail Car Loading	F040 TT/TC Scrubber	040F

In order to be subject to CAM a pollutant specific emissions unit must be subject to an emission limit or standard and use a control device to achieve compliance with that specific emission limit or standard. T220, R201, R202, R203, R206, R207, R208, and R209 do not have emission limits or standards; therefore they are not subject to CAM.

The TT/TC Scrubber (F040) is operated by Logistics which is covered under Group 3 of 5, but since its applicable requirements are specified under 4.1.3 and 4.4.4 of the Title V permit for Group 2 of 5, its CAM applicability will be discussed in this Fact Sheet. The only applicable requirements for the East Rack Rail Car Loading (TCL4) are those for a Group 2 Transfer Operation under 40 C.F.R. 63, Subpart G (HON MACT) and these emission standards are exempt from CAM per 40 C.F.R. §64.2(b)(1)(vi), therefore the East Rack Rail Car Loading (TCL4) and TT/TC Scrubber (F040) are not subject to CAM.

Some of the tanks in Acetone Derivatives have internal floating roofs. According to 40 C.F.R. §64.1, a control device does not include passive control measures such as seals, lids, or roofs. Since the internal floating roofs are passive controls, the tanks and floating roofs are not subject to CAM.

**Prevention of Significant Deterioration and Title V Greenhouse Gas Tailoring Rule.** Since the Union Carbide Corporation's Institute Plant has not made any changes that trigger a PSD modification, the requirements of the Greenhouse Gas Tailoring Rule do not apply.

### Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

- a. 40 C.F.R. 63, Subpart EEEE – “National Emission Standards for Hazardous Air Pollutants: Organic Liquid Distribution (Non-Gasoline).” Tanks T032A and T032B are used to store Dowtherm and Dowtherm is transferred at the loading/unloading rack TTL032. Tank 1201 is used to transload isophorone. Tank 265 (T265) was installed to store process coolant (ethylene glycol/water mixture) for the Acetone Industrial Refrigeration System (FES). These emission units are not subject to the requirements of 40 C.F.R. 63, Subpart EEEE for storage tanks and transfer racks because the liquid vapor pressures of Dowtherm, isophorone, and the process coolant (ethylene glycol/water mixture) are less than 0.1 psia.
- b. 40 C.F.R. 63, Subpart FFFF – “National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing.” While the batch process vents are subject to the MON MACT, there are no requirements from the rule that apply. The following sections of the rule are not applicable:

- i. §63.2460 – Does not apply to the batch process vents from Still S251 (Emission Point ID No. 030K) and Reactor Reactivation wet scrubber vent (Emission Point ID No. 030A) since each emission point has pre-control HAP emissions that are less than 200 lb/yr.
  - ii. §63.2480 – Does not apply to the equipment components associated with Still S251 and Reactor reactivation because the total HAP concentration is less than 5% weight in the process streams.
  - iii. §63.2485 – Does not apply to the reactivation water scrubber (Equipment ID No. D030) wastewater because the wastewater's annual average concentration of compounds in tables 8 and 9 to Subpart FFFF is less than 5 ppmw.
  - iv. §63.2490 – Does not apply to the heat exchangers S251TC and S251OC since these are once through cooling water systems, the discharge of which is subject to a NPDES permit.
- c. 40 C.F.R. 63, Subpart G – “National Emission Standards for Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater.” The gas stream from the 201 Scrubber that is routed to the Powerhouse Boiler or Dowtherm Furnace (Emission Unit ID B032) is not a process vent subject to the requirements of 40 C.F.R. 63, Subpart G because the gas stream is routed to a fuel gas system as defined in §63.101 and according to 40 C.F.R. §63.107(h)(3), a gas stream going to a fuel gas system is not a process vent.

### **Request for Variances or Alternatives**

None.

### **Insignificant Activities**

Insignificant emission unit(s) and activities are identified in the Title V application.

### **Comment Period**

Beginning Date: (Date of Notice Publication)  
Ending Date: (Publication Date PLUS 30 Days)

All written comments should be addressed to the following individual and office:

Carrie McCumbers  
Title V Permit Writer  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304

### **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

**Point of Contact**

Carrie McCumbers  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1226 • Fax: 304/926-0478

**Response to Comments (Statement of Basis)**

No comments were received.